

## DELTA PROTECTION COMMISSION

14215 RIVER ROAD  
P.O. BOX 530  
WALNUT GROVE, CA 95690  
PHONE: (916) 776-2290  
FAX: (916) 776-2293

April 25, 1996



APR 29 1996

Lester Snow  
CALFED  
1416 Ninth Street  
Sacramento, CA 95814

Subject: Delta Protection Commission Concerns Regarding the  
CALFED Program Alternatives

Dear Mr. Snow:

As the alternative development process proceeds, I think it timely to reiterate the Delta Protection Commission's adopted policies as they apply generally to CALFED project alternatives. These comments have not been reviewed by the entire Commission, but they are based on the Commission's "Land Use and Resource Management Plan for the Primary Zone of the Delta" (Plan), adopted February 23, 1995. The Commission's areas of concern and interest focus on land uses in the Delta, not issues primarily associated with water quality and uses.

The alternatives developed by the CALFED staff should consider and reflect the policies in the Commission's adopted Plan. The Plan was adopted unanimously by the 19-member Commission made up of representatives of Delta cities, Delta Counties, Reclamation Districts, and six State agencies with interests in the Delta. This unique group considered a wide range of topics, issues, and information in developing the Plan and received input from many Delta residents, landowners, users, and others with interest in the Delta.

Agricultural Land Use:

The Commission's enabling legislation calls for the protection and continuation of the existing primary land use in the Delta--agriculture. When the Commission began its regional planning work in January, 1993, almost all of the 450,000 acres of land in the Primary Zone of the Delta were in agricultural

96-105

DELTA PROTECTION COMMISSION

14215 RIVER ROAD  
P.O. BOX 530  
WALNUT GROVE, CA 95690  
PHONE: (916) 776-2290  
FAX: (916) 776-2293

April 25, 1996



APR 29 1996

Lester. Snow  
CALFED  
1416 Ninth Street  
Sacramento, CA 95814

Subject: Delta Protection Commission Concerns Regarding the  
CALFED Program Alternatives

Dear Mr. Snow:

As the alternative development process proceeds, I think it timely to reiterate the Delta Protection Commission's adopted policies as they apply generally to CALFED project alternatives. These comments have not been reviewed by the entire Commission, but they are based on the Commission's "Land Use and Resource Management Plan for the Primary Zone of the Delta"(Plan), adopted February 23, 1995. The Commission's areas of concern and interest focus on land uses in the Delta, not issues primarily associated with water quality and uses.

The alternatives developed by the CALFED staff should consider and reflect the policies in the Commission's adopted Plan. The Plan was adopted unanimously by the 19-member Commission made up of representatives of Delta cities, Delta Counties, Reclamation Districts, and six State agencies with interests in the Delta. This unique group considered a wide range of topics, issues, and information in developing the Plan and received input from many Delta residents, landowners, users, and others with interest in the Delta.

Agricultural Land Use:

The Commission's enabling legislation calls for the protection and continuation of the existing primary land use in the Delta--agriculture. When the Commission began its regional planning work in January, 1993, almost all of the 450,000 acres of land in the Primary Zone of the Delta were in agricultural

use. Since that time, many programs and projects have moved forward that will result in the retirement of agricultural lands in the Primary Zone. Almost all of the targeted lands will be enhanced for wildlife habitat.

Major programs which will result in agricultural land retirement include: Sherman and Twitchell Islands (13,500 acres); Delta Wetlands (20,000 acres); Yolo Bypass Wetlands (3,200 acres); Prospect Island (1,200 acres); Medford Island Mitigation Bank (1,200 acres); Palm Tract Mitigation Site; 1,069 acres); Stone Lakes Wildlife Refuge (9,000 acres public ownership, 9,000 acres private ownership and management under agreement with USFW); and Beach Lake Mitigation Site/CalTrans (114 acres). A Reconnaissance Report was recently released described opportunities to create aquatic habitats on Little Holland and Liberty Islands (6,900 acres). Hastings Tract has also been suggested as an aquatic habitat site (7,150 acres).

The Commission is concerned that alternatives that remove additional lands from agricultural use will have a serious cumulative, negative impact on the region's economic health, and will result in severe loss of property taxes, payroll dollars, and funds for the agricultural service industry and agriculture associated businesses. The Commission urges full consideration of the impacts of retiring additional agricultural lands in the Delta.

#### Levees:

The Commission has already sent you a letter outlining the Commission's adopted position that all the Delta levees should eventually be brought to the more stable and more reliable PL-99 agricultural standard. There has been some discussion of developing criteria to prioritize some islands, which would indicate some islands are more important than others. The Commission instead respects the values of each of the Delta islands and sees the region as an inter-related whole, that each island is a unique part of the overall system.

### Wildlife Habitat:

The Commission's enabling legislation identifies wildlife habitat as one of the primary uses of the Delta. The area has historically been used for both agriculture and seasonal wildlife habitat. Casual hunting has traditionally occurred on agricultural lands flooded in the winter months. The Delta includes lands managed primarily as duck clubs for recreational uses, but providing year-round habitat values. In addition, there are many small channel islands and berm areas which provide tidal and riparian habitat. These existing wildlife habitat values should be protected.

One aspect of wildlife habitat creation which should be fully considered is possible adverse impacts to adjoining agricultural lands. If lands are permanently flooded there may be seepage on adjoining lands which can adversely affect on-going farming operations. Land managers have also been concerned about possible restrictions to agricultural practices, such as aerial spraying, if special habitat areas are created on adjacent parcels. The Commission's Plan recommends that adequate buffers be designed as part of all new projects, including new wildlife habitat areas.

### Recreation:

One area of existing use within the Delta does not appear to be incorporated into the current preliminary proposals is recreation. The Delta is well known as an area of statewide value for water-oriented recreational use and provides millions of recreation days each year. Most of the existing recreational opportunities are provided by the many private marinas; there are almost 11,000 berths in the Legal Delta and many launch ramps that service small, trailerable boats. In the Primary Zone, there are only a few locations which provide access to the general public: five fishing/launching points; White Slough Wildlife Area; Brannan Island State Park; Delta Meadows; and Westgate Landing.

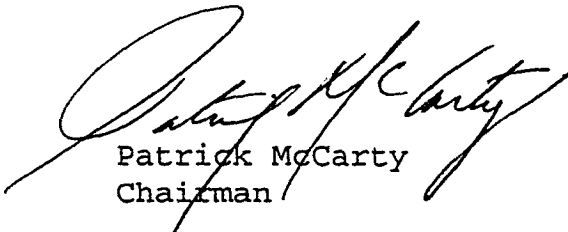
The Commission's adopted recommendations regarding recreation and access state:

State and federal projects in the Primary and Secondary Zones should include appropriate recreation and/or public access components to the extent consistent with project purposes and with available funding. State and federal agencies should consider private or user groups improvements on publicly-owned lands to provide facilities (example: windsurf access at Brannan Island State Park).

The Commission's Plan recognizes that some recreational activities are detrimental to habitat values; such as those that create loud noises, create waves or wakes, or disturb sediments. In addition the Plan recognizes that wake erosion can adversely impact wildlife habitat areas, such as channel islands. A Plan recommendation which may be helpful in studying the overall management of the Delta, is the recommendation to study to carrying capacity of the Delta waterways for recreation activities without degradation of habitat values and which minimize impacts to agriculture or levees.

In summary, the CALFED process should consider and incorporate the land use policies in the Commission's adopted Plan in the alternatives to be evaluated in the environmental document. Please feel free to call me or the Commission's staff, Margit Aramburu, if you have any questions about this letter.

Sincerely,



Patrick McCarty  
Chairman

cc: Delta Protection Commission